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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JUL 20 2021

SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAIME FLORES and
AMANDA MARIE MAGER
(a/k/a Amanda Marie Monroy),

Defendants.

2:21-CR-94-RMP
INDICTMENT

Vio.: 21 U.S.C. § 841(a)(1),
(b)(1)(B)(vi),
Possession with Intent to
Distribute of 40 Grams or More
of Fentanyl (Count 1)

18 U.S.C. § 4,
Misprision of a Felony (Count 2)

21 U.S.C. § 853
Forfeiture Allegations

The Grand Jury charges:

COUNT ONE

On or about February 20, 2021, in the Eastern District of Washington, the Defendant, JAIME FLORES, knowingly and intentionally possessed with the intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (aka Fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(vi).

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SERIOUS DRUG FELONY

Before JAIME FLORES committed the offense charged in Count 1 of this Indictment, JAIME FLORES had a final conviction for a serious drug felony, as defined in 21 U.S.C. § 802(57), to wit: Possession with Intent to Distribute 100 Grams or More of a Mixture or Substance Containing a Detectable Amount of Heroin, in violation of 21 U.S.C § 841(a)(1), (b)(1)(B)(i), in the United States District Court for the Eastern District of Washington, Case No. 2:17-CR-00129-RMP, and having served a term of imprisonment beginning on or about July 13, 2017, and continuing until on or about January 24, 2020.

COUNT TWO

Beginning on a date unknown, but by on or about January 26, 2021 and continuing until on or about February 20, 2021, in the Eastern District of Washington, the Defendant, AMANDA MARIE MAGER (a/k/a Amanda Marie Monroy), having knowledge of the actual commission of a felony cognizable by a court of the United States, to wit: Distribution of Methamphetamine, Heroin, and/or Fentanyl, did conceal the same by allowing Jaime Flores to utilize her residence in Spokane, Washington to distribute those controlled substances, and did not as soon as possible make known the same to some judge or other person in civil or military authority under the United States, in violation of 18 U.S.C. § 4.

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense of violation of 21 U.S.C. § 841(a)(1), as charged in Count 1 of this Indictment, the Defendant, JAIME FLORES, shall forfeit to the United States of America, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the

1 result of such offense and any property used or intended to be used, in any manner
2 or part, to commit or to facilitate the commission of the offense.

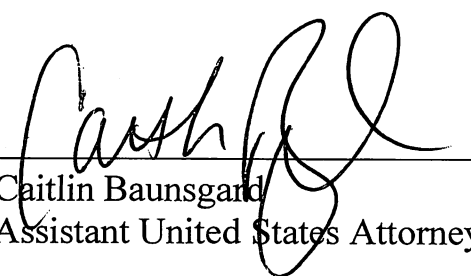
3 If any forfeitable property, as a result of any act or omission of the
4 Defendant:

- 5 (a) cannot be located upon the exercise of due diligence;
6 (b) has been transferred or sold to, or deposited with, a third party;
7 (c) has been placed beyond the jurisdiction of the court;
8 (d) has been substantially diminished in value; or
9 (e) has been commingled with other property which cannot be divided
10 without difficulty,

11 the United States of America shall be entitled to forfeiture of substitute property
12 pursuant to 21 U.S.C. § 853(p).
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15 DATED: this 20th day of July 2021.
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21 Joseph Harrington
22 Acting United States Attorney

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25 Caitlin Baunsgard
26 Assistant United States Attorney
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